

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF C. BRETT VAUGHN IN OPPOSITION TO DEFENDANTS'
MOTION TO EXCLUDE OPINIONS OF RON NAJAFI, PH.D.**

I, C. BRETT VAUGHN, hereby certify as follows:

1. I am an attorney at law within the State of Kansas with the Hollis Law Firm, P.A., and serve as a Court-appointed Member of the Plaintiffs' Executive Committee. I am fully familiar with the facts and circumstances of these actions. I make this certification in opposition to Defendants' motion to exclude opinions of Dr. Ron Najafi.
2. The facts set forth in this certification are based upon my personal knowledge, information, and belief, unless otherwise stated.
3. Attached hereto as **Exhibit A** is a true and accurate copy of Dr. Mark Robbins' Expert Report at 9.
4. Attached hereto as **Exhibit B** is a true and accurate copy of Dr. Roger Williams' Deposition Transcript at 78:14-79:12; 126:12-127:13.
5. Attached hereto as **Exhibit C** is a true and accurate copy of PRINSTON00075797 at 810-11, 818-19.

6. Attached hereto as **Exhibit D** is a true and accurate copy of ICH M7(R1) Assessment and Control of DNA Reactive (Mutagenic) Impurities in Pharmaceuticals to Limit Potential Carcinogenic Risk, May 2015.
7. Attached hereto as **Exhibit E** is a true and accurate copy of APL-MDL-2875-1296768.
8. Attached hereto as **Exhibit F** is a true and accurate copy of APL-MDL-2875-0687069.
9. Attached hereto as **Exhibit G** is a true and accurate copy of Dr. Rao's Deposition Transcript at 225:19-228:6.
10. Attached hereto as **Exhibit H** is a true and accurate copy of Auro-MDL-2875-0105928.
11. Attached hereto as **Exhibit I** is a true and accurate copy of the FDA March 1, 2019 Aurobindo 38 Lot Recall.
12. Attached hereto as **Exhibit J** is a true and accurate copy of Auro-MDL-2875-0081255.
13. Attached hereto as **Exhibit K** is a true and accurate copy of TEVA-MDL2875-00686472.
14. Attached hereto as **Exhibit L** is a true and accurate copy of TEVA-MDL2875-00166763.
15. Attached hereto as **Exhibit M** is a true and accurate copy of TEVA-MDL2875-00307398.
16. Attached hereto as **Exhibit N** is a true and accurate copy of TEVA-MDL2875-00475626.
17. Attached hereto as **Exhibit O** is a true and accurate copy of Dr. Steven Baertschi's Expert Report at Paragraph 31.
18. Attached hereto as **Exhibit P** is a true and accurate copy of TEVA-MDL2875-00025620.
19. Attached hereto as **Exhibit Q** is a true and accurate copy of TEVA-MDL2875-00095898.
20. Attached hereto as **Exhibit R** is a true and accurate copy of TEVA-MDL2875-00004495.
21. Attached hereto as **Exhibit S** is a true and accurate copy of TEVA-MDL2875-00168156.
22. Attached hereto as **Exhibit T** is a true and accurate copy of MYLAN-MDL2875-00264679.

I hereby certify that the aforementioned statements made by me are true. I am aware that if any of the aforementioned statements made by me are willfully false, I am subject to punishment.

Dated: June 2, 2022

Respectfully Submitted,

By: /s/ C. Brett Vaughn
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